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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

COLLEEN STROEDER,

Plaintiff,

v.

SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 503, OREGON PUBLIC  
EMPLOYEES UNION; KATE BROWN, in  
her official capacity as governor of Oregon,  
PAUL MATHER, in his official capacity as  
acting director of the Oregon Department of  
Transportation and KATY COBA, in her  
official capacity as director of the Oregon  
Department of Administrative Services,

Defendants.

Case No. 3:19-cv-01181-BR


DECLARATION OF NETTIE PYE IN  
SUPPORT OF STATE DEFENDANTS'  
MOTION TO DISMISS

I, Nettie Pye, declare:

1. I am a State Labor Relations Manager for the State of Oregon and am employed by the Oregon Department of Administrative Services ("DAS").
2. I make this declaration based upon a combination of personal knowledge and in reliance upon records which are regularly maintained by the State of Oregon in the ordinary course of business.
3. Plaintiff Colleen Stroeder is an executive support specialist for the Oregon Department of Transportation ("ODOT").
4. DAS receives a Membership File from Service Employees International Union Local 503, Oregon Public Employees Union ("SEIU") on a monthly basis, which includes SEIU's instructions on adding, maintaining, or ending dues deductions for employees represented by SEIU. Once received, DAS distributes the file to agencies for processing.
5. On August 20, 2019, SEIU instructed DAS through the SEIU Membership File to cease deducting union dues from Ms. Stroeder's paychecks. DAS distributed that information to ODOT who has followed that instruction. Union-related dues will not be deducted again from Ms. Stroeder's paychecks in connection with her employment with ODOT unless she rejoins SEIU and SEIU instructs DAS to begin withholding dues from her paycheck.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

EXECUTED on October 15, 2019.

  
NETTIE PYE